

REMARKS

In response to the non-final Office action of December 28, 2004, applicant asks that all claims be allowed in view of the amendment to the claims and the following remarks.

Claims 1-57 are now pending, of which claims 1, 2, 4, 5, 23, 24, 27-29, 35, 37-39, 45, 47 and 51 are independent. Claims 1-6, 23-31, 35, 37-47 have been amended, and claims 48-57 have been added. Amendments to claims 1, 28, 38, 23, 35 and 45 find support at least in the specification at page 11, lines 1-4 and FIG. 4. New claim 51 finds support at least in the specification at page 10, lines 3-4. Applicant asserts that no new matter has been added.

Request for Initialed Copy of Form PTO -1449

As an administrative matter, applicant notes an initialed copy of the Form PTO-1449 filed concurrently with the present application on July 17, 2003 was not received with the Office action mailed on December 28, 2004. It is therefore respectfully requested that the Examiner return a copy of the initialed Form PTO-1449 to applicant. A courtesy copy of the Form PTO-1449 filed on July 17, 2003 is provided.

Allowable Subject Matter (Claims 2-5, 24, 25, 27, 29, 30, 37, 39, 40 and 47)

Applicant acknowledges with appreciation the indication that claims 2-5, 24, 25, 27, 29, 30, 37, 39, 40 and 47 would be allowable if written in independent form including all limitations of the base claim and any intervening claims. See Office action of December 28, 2004 at page 6, lines 13-15. In response, claims 2, 4, 5, 24, 27, 29, 37, 39 and 47 have been rewritten in independent form including all limitations of the base claim and any intervening claims. Claims 3, 25, 30 and 40 have been amended to depend from one of the rewritten claims. Accordingly, applicant asks for allowance of claims 2-5, 24, 25, 27, 29, 30, 37, 39, 40 and 47.

Rejection under Section 103 (Claims 1, 6-23, 28, 31-36, 38, and 41-46)

Claims 1, 6-23, 28, 31-36, 38, and 41-46 were rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent Application Publication No. 2003/0156049 (Behr) in view of U.S. Patent No. 6,826,472 (Kamei). Applicant requests reconsideration and withdrawal of the

rejection because neither Behr, Kamei nor any combination thereof does describe or suggest the subject matter of independent claims 1, 23, 28, 35, 38, and 45, as described more fully below.

a. Claims 1, 6-22, 28, 31-34, 38, and 41-44

Amended independent claim 1 recites a method of displaying driving directions having multiple maneuvers. The method includes accessing maneuver information for a route from an origin to a destination, where the maneuver information comprises text information. The method also includes presenting, as a constituent part of the driving directions, a first maneuver along the route involving a particular interstate and presenting, as another constituent part of the driving directions, a second maneuver along the route involving the particular interstate, such that the first and second maneuvers are presented consecutively among the driving directions. The method also includes associating an interstate shield route symbol that has substantially the same appearance as an interstate road sign with less than all presented maneuvers being presented along the route and involving the particular interstate.¹

With regard to claim 1, the Office action asserts that Behr shows accessing maneuver information for a route from an origin to a destination and displaying travel directions along with a display of highway signs, but does not explicitly disclose an interstate shield route symbol. See Office action of December 28, 2004 at page 2, lines 14-19. For this teaching, the Office action relies on Kamei. See Office action of December 28, 2004 at page 2, lines 20-24 citing Kamei at FIGS. 11 and 14 and cols. 15 and 16. The Office action asserts that it is obvious that an interstate route symbol can also be displayed along with travel direction and to associate an interstate shield route symbol in a list of maneuvers for the route. See Office action of December 28, 2004, 2004 at page 2, line 24 to page 3, line 8. Applicant traverses. Specifically, applicant requests reconsideration and withdrawal of the rejection because neither Behr, Kamei nor any combination thereof does describe or suggest presenting, as a constituent part of the driving directions, a first maneuver along the route involving a particular interstate, presenting, as another constituent part of the driving directions, a second maneuver along the route involving the particular interstate, such that the first and second maneuvers are presented consecutively

¹ The underlined portions were added by this amendment, and, naturally, were not addressed by the Office action.

among the driving directions, and associating an interstate shield route symbol that has substantially the same appearance as an interstate road sign with less than all presented maneuvers being presented along the route and involving the particular interstate, as recited in amended independent claim 1.

Kamei discloses techniques for a “navigation device [that] displays major routes and direction indications without a specific destination requirement.” See Kamei at Abstract. Kamei displays a large-scale map, or portion thereof, that includes a road shield symbol and “decision points” at which a vehicle driver can make a maneuver decision. See Kamei at FIG. 11 (showing a graphic shield with numeral “101” and a graphic shield with numeral “280”) and col. 14, lines 9-67. Hence, Kamei discloses associating a road shield symbol with a road on a map. As such, Kamei does not disclose supplementing text directions for a route with route symbols for the roads included in the text directions. In particular, Kamei’s road shield symbol on a map is not associated with a maneuver that includes text information for a route. As such, Kamei’s road shield symbol does not describe or suggest presenting, as a constituent part of the driving directions, a first maneuver along the route involving a particular interstate, presenting, as another constituent part of the driving directions, a second maneuver along the route involving the particular interstate, such that the first and second maneuvers are presented consecutively among the driving directions, and associating an interstate shield route symbol that has substantially the same appearance as an interstate road sign with less than all presented maneuvers being presented along the route and involving the particular interstate, as recited in amended claim 1.

Kamei also discloses a “highway sign” display format that, in various embodiments, provides a tabular form of information (such as exit points to a highway, entrance points to a highway and destination information) related to a decision point. See Kamei at col. 15, lines 1-17. As illustrated in Kamei’s Figure 12, the “highway sign” display format shows a destination (i.e., the city of El Camino), a list of highways, and, for each highway, a directional indicator that indicates a maneuver direction from the particular decision point (i.e., decision point 1180 shown on Figure 11). Kamei’s Figure 13 shows a similar “highway sign” display for a listing of cities and destinations that includes direction indicators and a distance from an origin. See Kamei at FIG. 13 and col. 15, lines 40-67. In Figures 14A, 14B and 15, Kamei’s “highway sign” display

shows a tabular display of exit points from a freeway. See Kamei at FIGS. 14A-15 and col. 16, lines 1-30. See also Kamei at col. 16, lines 2-6 (stating “[t]he display of FIG. 14A is at a level that shows each of exit points from a freeway being traveled by a user...and lists each exit and/or major city associated with each exit of the freeway on which the user is traveling.”).

Thus, Kamei discloses a “highway sign” display that includes directional indicators for potential destinations/exit points/entrance points associated with a decision point when traveling a road. As such, Kamei’s “highway sign” display includes multiple, potential maneuvers that a driver may make at a decision point, and, hence, Kamei’s “highway sign” display does not present, as a constitute part of driving directions, a maneuver along the route involving a particular interstate. Moreover, Kamei’s “highway sign” display does not describe or suggest presenting, as a constituent part of the driving directions, a first maneuver along the route involving a particular interstate, presenting, as another constituent part of the driving directions, a second maneuver along the route involving the particular interstate, such that the first and second maneuvers are presented consecutively among the driving directions, and associating an interstate shield route symbol that has substantially the same appearance as an interstate road sign with less than all presented maneuvers presented along the route and involving the particular interstate, as recited in amended claim 1.

According, Kamei does not describe or suggest presenting, as a constituent part of the driving directions, a first maneuver along the route involving a particular interstate, presenting, as another constituent part of the driving directions, a second maneuver along the route involving the particular interstate, such that the first and second maneuvers are presented consecutively among the driving directions, and associating an interstate shield route symbol that has substantially the same appearance as an interstate road sign with less than all presented maneuvers presented along the route and involving the particular interstate, as recited in amended claim 1.

Behr is directed to providing route guidance information from a base unit to a remote unit. See Behr at Abstract. Behr graphically presents a geometric representation of an intersection with a text direction. See Behr at FIGS. 6-10. As such, Behr does not describe or suggest an interstate shield route symbol. According, Behr does not describe or suggest associating an interstate shield route symbol that has substantially the same appearance as an

interstate road sign with less than all presented maneuvers being presented along the route and involving the particular interstate, as recited in amended claim 1.

Thus, Behr, Kamei or any combination of the references does not describe or suggest presenting, as a constituent part of the driving directions, a first maneuver along the route involving a particular interstate, presenting, as another constituent part of the driving directions, a second maneuver along the route involving the particular interstate, such that the first and second maneuvers are presented consecutively among the driving directions, and associating an interstate shield route symbol that has substantially the same appearance as an interstate road sign with less than all presented maneuvers being presented along the route and involving the particular interstate, as recited in amended claim 1.

For at least these reasons, applicant requests reconsideration and withdrawal of the rejection of claim 1 and claims 6-22, which depend directly or indirectly from claim 1.

Similarly to independent claim 1, independent claims 28 and 38 each recite presenting, as a constituent part of the driving directions, a first maneuver along the route involving a particular interstate, presenting, as another constituent part of the driving directions, a second maneuver along the route involving the particular interstate, such that the first and second maneuvers are presented consecutively among the driving directions, and associating an interstate shield route symbol that has substantially the same appearance as an interstate road sign with less than all presented maneuvers being presented along the route and involving the particular interstate. Accordingly, for the reasons noted above with respect to claim 1, applicant requests withdrawal of the rejection of claims 28 and 38 along with their respective dependent claims 31-34 and 41-44.

b. Claims 23, 35, 36, 45 and 46

Amended independent claim 23 recites a method for displaying driving directions having multiple maneuvers that includes, *inter alia*, accessing maneuver information representing driving directions for a route from an origin to a destination and accessing priority information that includes, for each of several route symbol types, a priority and a condition. The method also includes determining a route symbol of the several route symbol types to be associated with a maneuver of the driving directions based on a priority associated with the route symbol and the

maneuver fulfilling a condition associated with the route symbol, and associating the route symbol with the maneuver. The method also recites each maneuver in the list of maneuvers for the route being associated with at most one route symbol.

With regard to claim 23, the Office action asserts that Behr shows applying priority information to determine a route symbol of several route symbol types to be associated with a maneuver of the driving directions and cites paragraphs [0100] through [0107] in support. See Office action of December 28, 2004 at page 4, lines 20-22. The cited portion of Behr discloses techniques for displaying a geometric representation of an intersection of roads, which Behr refers to as "maneuver arms." See Behr at paragraphs [0091], [0094] and [0103]. Behr discloses a remote unit querying a base unit for intersection information and processing a received response that includes maneuver arm information to generate a geometric representation of a particular intersection for display on the remote unit. See Behr at paragraph [0103]. To do so, Behr uses x,y coordinates to specify the end points of each road in the intersection to draw turn angles of the roads in the geometric representation of the intersection. See Behr at paragraphs [0104-0107]. As such, Behr discloses using geometric information about an intersection to display a geometric representation of an intersection. Assuming for the sake of argument only that Behr's geometric representation of an intersection corresponds to the claimed route symbol, Behr, at most, discloses using geometric information to display a routing symbol. Accordingly, Behr does not describe or suggest accessing priority information that includes, for each of several route symbol types, a priority and a condition or determining a route symbol of the several route symbol types to be associated with a maneuver of the driving directions based on a priority associated with the route symbol and the maneuver fulfilling a condition associated with the route symbol, as recited in amended claim 23.² Nor does Kamei's disclosure of a highway sign formal or a road shield symbol remedy the failure of Behr to describe or suggest the subject matter of amended independent claim 23.

Thus, none of Behr, Kamei or any combination of the two references describe or suggest a method for displaying driving directions having multiple maneuvers that includes accessing priority information that includes, for each of several route symbol types, a priority and a

² The underlined portion of claim 23 was added by this amendment, and, naturally, was not addressed by the Office action.

condition and determining a route symbol of the several route symbol types to be associated with a maneuver of the driving directions based on a priority associated with the route symbol and the maneuver fulfilling a condition associated with the route symbol, as recited in claim 23.

Therefore, for at least these reasons, applicant requests reconsideration and withdrawal of the rejection of amended independent claim 23 and claim 27 that depends on claim 23.

Similarly to amended independent claim 23, amended independent claims 35 and 45 each recite accessing priority information that includes, for each of several route symbol types, a priority and a condition or determining a route symbol of the several route symbol types to be associated with a maneuver of the driving directions based on a priority associated with the route symbol and the maneuver fulfilling a condition associated with the route symbol. Accordingly, for the reasons noted above with respect to claim 23, applicant requests withdrawal of the rejection of claims 35 and 45 along with their respective dependent claims 36, 37, 46 and 47.

Newly Added Claims 48-50

Each of claims 48-50 depend from independent claim 1, 28 or 38 respectively. At least for the reason of that dependency and the reason noted above with respect to amended independent claims 1, 28 and 38, applicant submits that claims 48-50 are allowable.

Newly Added Claims 51-57

Newly added independent claim 51 recites a method for displaying driving directions having multiple maneuvers that includes accessing maneuver information that includes driving directions for a route from an origin to a destination and determining the existence within the maneuver information of multiple consecutive driving directions involving a particular road. The method also includes presenting at least one instance of a road-related graphic for a group of multiple consecutive driving directions involving the particular road, where the number of separate instances of the road-related graphic presented is fewer than a number of consecutive directions within the group that involve the particular road.

Kamei's road shield graphic is associated with a road on a map and, as such, is not associated with a group of multiple consecutive driving directions involving a particular road. Accordingly, Kamei's road shield graphic does not describe or suggest presenting at least one

instance of a road-related graphic for a group of multiple consecutive driving directions involving the particular road, where the number of separate instances of the road-related graphic presented is fewer than a number of consecutive directions within the group that involve the particular road, as recited in new independent claim 51.

Kamei's "highway display" format presents multiple, potential maneuvers that a driver may make at a decision point, and, hence, Kamei's "highway sign" display does not describe or suggest presenting at least one instance of a road-related graphic for a group of multiple consecutive driving directions involving the particular road, where the number of separate instances of the road-related graphic presented is fewer than a number of consecutive directions within the group that involve the particular road, as recited in new independent claim 51.

Accordingly, Kamei does not describe or suggest presenting at least one instance of a road-related graphic for a group of multiple consecutive driving directions involving the particular road, where the number of separate instances of the road-related graphic presented is fewer than a number of consecutive directions within the group that involve the particular road, as recited in new independent claim 51.

Nor does Behr describe or suggest presenting at least one instance of a road-related graphic for a group of multiple consecutive driving directions involving the particular road, where the number of separate instances of the road-related graphic presented is fewer than a number of consecutive directions within the group that involve the particular road.

At least for these reasons, applicant submits that claim 51 is allowable over Kamei and Behr, and claims 52-57 are allowable at least by virtue of dependency on independent claim 51.

Conclusion

It is believed that all of the pending issues have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this reply should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this reply, and the

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amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Enclosed is a check in the amount of \$2500 for excess claim fees. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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